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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

**CASCADIA WILDLANDS, KLAMATH-
SISKIYOU WILDLANDS CENTER,
OREGON WILD, SODA MOUNTAIN
WILDERNESS COUNCIL, and
WILLAMETTE RIVERKEEPER,**

Plaintiffs,

vs.

**UNITED STATES BUREAU OF LAND
MANAGEMENT,**

Defendant.

Civ. Case No. 6:21-cv-01313-AA

**JOINT MOTION TO EXTEND STAY OF
PROCEEDINGS**

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 16-3, Plaintiffs Cascadia Wildlands, Klamath-Siskiyou Wildlands Center, Oregon Wild, Soda Mountain Wilderness Council, and Willamette Riverkeeper (“Plaintiffs”) and Federal Defendant the United States Bureau of Land Management (“BLM”) hereby respectfully request that the Court stay the summary judgment briefing schedule for 60 days. Defendant-Intervenor does not oppose this motion. Plaintiffs and Federal Defendant have reached a settlement in principle in this matter, subject to approval by the authorized officials at the Department of Justice, the United States

Department of the Interior, and the BLM, and seek additional time to effectuate their settlement and file the agreement with this Court.

This Court has broad discretion to stay proceedings and to defer judicial review in the interest of justice and efficiency. *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936) (“[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants”).

Plaintiffs filed this action challenging the BLM’s Salvage Categorical Exclusion (“Salvage CX”) and the Harvest Land Base-Moderate Intensity Timber Area Salvage Project implemented pursuant to that Salvage CX. ECF No. 1, 17. On April 4, Plaintiffs and Federal Defendant requested to stay the deadlines in this case pending the BLM’s review of the Salvage CX, ECF No. 37, and thereafter sought an extension of the deadlines to explore settlement, ECF No. 41, which this Court granted on June 6, 2022. ECF No. 42. In the interest of efficiency and judicial economy, Plaintiffs and the BLM request a 60-day stay of the proceedings in this case to complete settlement of this matter.

Dated: August 4, 2022.



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